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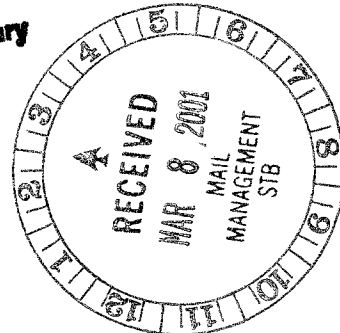
March 8, 2001

Mr. Vernon Williams  
Office of the Secretary  
Surface Transportation Board  
Case Control Unit  
1925 K St. N.W.  
Washington, D.C. 20423-0001

**ENTERED**  
Office of the Secretary

**MAR 09 2001**

Part of  
Public Record



**Re: STB Ex Parte No. 582 (Sub-No. 1) Oral Argument**

**Via Hand Delivery**

Dear Mr. Williams:

BASF Corporation hereby requests the opportunity to present oral argument on April 5, 2001 in Ex Parte 582 (Sub-No.1), Major Rail Consolidation Procedures.

In accordance with the STB decision served February 23, 2001, BASF will address the key issues in its filings before the STB in this proceeding focusing on the following points:

- ☐ The need for the STB to implement pro-competitive modifications:
- ☐ The advisability of the STB adopting a rebuttable presumption that further mergers are against the public interest.
- ☐ The advisability of the STB applying comprehensive and rigorous pre-merger testing within a merger review process segmented into three sequential steps:
- ☐ The need for the STB to guarantee shipper compensation for reduction and loss of rail service attributable to mergers.
- ☐ The advisability of a Blue Ribbon Advisory Panel to provide timely and objective oversight during merger review and implementation.

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The presentation is expected to require 10 to 15 minutes and will be made by Mr. Rory Solga, Manager, BASF Rail Command Center.

We have provided the original and 25 copies of this filing. We would appreciate it if your staff would date stamp the second copy of this letter for return to us. Should questions arise, please call me at (202) 371-9149.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom O'Connor", written over the printed name.

Tom O'Connor  
Vice President